



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

EPA Region 5 Records Ctr.



261585

Refer to: 0316000033 -- Cook County
Chicago/Paxton #2
Subpart F, Groundwater Monitoring
Compliance Inquiry Letter

November 2, 1984

CERTIFIED # P731918605

Dan Smith
Paxton Landfill Corp.
12201 South Oglesby
Chicago, Illinois 60633

Dear Mr. Smith:

On August 23, 1984 the above referenced hazardous waste management facility was inspected by John Wilson and Eric White of Harding Lawson Associates, a USEPA contractor. The purpose of this inspection was to determine the applicability of Title 35, Illinois Administrative Code, Subtitle G, Part 725: Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities (40 CFR Part 265). The inspection and associated file review disclosed that your facility has accepted hazardous waste after November 19, 1980. This letter addresses only the apparent violations of Subpart F of Part 725. Correspondence concerning other applicable sections of Part 725 will be forthcoming from our Maywood Regional Office.

The ERTEC checklist the following apparent violations of Subpart F were disclosed:

Class I

725.190 (all parts therein) - Failure to implement a groundwater monitoring program capable of determining the facility's impact on the quality of the groundwater in the uppermost aquifer underlying the facility.

725.191 (all parts therein) - Failure to implement a groundwater monitoring system.

725.192 (all parts therein) - Failure to implement a sampling and analysis plan with respect to the groundwater monitoring system.

725.193 (all parts therein) - Failure to prepare an outline of a groundwater quality assessment program.

Class II

725.194 (all parts therein) - Failure to implement a groundwater monitoring record keeping and reporting program.

While your facility has implemented a groundwater monitoring program in accordance with Operating Permit 1978-11-OP, that program is inadequate to meet the requirements of Subpart F. A revised groundwater monitoring program is required.

Therefore, you are hereby requested to submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the apparent violations outlined above as well as a schedule to bring your facility into compliance. This compliance schedule should at a minimum provide milestone dates for:

1. the submission of a proposed Subpart F groundwater monitoring program;
2. the submission of a sampling and analysis plan;
3. the submission of an assessment plan outline;
4. the installation and initial sampling of all new monitoring wells; and
5. the resolution of all apparent Subpart F violations.

This information should be submitted to:

Illinois Environmental Protection Agency
Division of Land Pollution Control #24
2200 Churchill Road
Springfield, Illinois 62706

Attention: Mark A. Haney, Manager
Facilities Compliance Unit

Be aware that non-compliance with the terms or conditions of the Rules and Regulations of the Illinois Pollution Control Board, may be the subject of enforcement actions pursuant to Title VIII of the Illinois Environmental Protection Act, Ch. 111 1/2, Ill. Rev. Stat. Section 1001 et seq.

If you have any questions, please contact Dale Helmers of my staff.

Sincerely,



Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

MAH:DAH:mkb

cc: Division File ✓
Region
Compliance Correspondence Log (A)
Don Gimbel
Larry Eastep
Wally El-Beck